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14 *Attorneys for Debtors  
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16 **UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

17  
18 **In re:**

19 **PG&E CORPORATION,**

20 **- and -**

21 **PACIFIC GAS AND ELECTRIC  
COMPANY,**

22 **Debtors.**

23  
24  Affects PG&E Corporation  
25  Affects Pacific Gas and Electric Company  
26  Affects both Debtors

27 \* *All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

28 Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**STIPULATION BY AND BETWEEN  
REORGANIZED DEBTORS AND  
MICHAEL DEWAN DENNIS MADDEN  
EXPUNGING PROOF OF CLAIM  
NO. 103767 AND CONFIRMING  
SURVIVAL OF PROOF OF CLAIM NO.  
104054**

[Related to Dkt. No. 10922]

[No Hearing Date Requested]

1 PG&E Corporation and Pacific Gas and Electric Company, as debtors and reorganized  
2 debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the above-captioned  
3 chapter 11 cases (the “**Chapter 11 Cases**”), on the one hand, and Michael DeWan Dennis Madden  
4 (“**Madden**”), on the other hand, hereby submit this stipulation (the “**Stipulation**”) for an order  
5 permitting the expungement Proof of Claim No. 103767 (the “**Original Proof of Claim**”), and  
6 confirming that Proof of Claim No. 104054 (the “**Amended Proof of Claim**”) will survive such  
7 expungement. The Reorganized Debtors and Madden are referred to in this Stipulation collectively  
8 as the “**Parties**,” and each as a “**Party**.<sup>1</sup>” The Parties hereby stipulate and agree as follows:

9 **RECITALS**

10 A. On January 29, 2019, the Debtors commenced the Chapter 11 Cases in the United  
11 States Bankruptcy Court for the Northern District of California (the “**Bankruptcy Court**”).

12 B. On May 4, 2020, Madden filed the Original Proof of Claim, asserting certain claims  
13 relating to his purchase of certain equity securities of PG&E Corporation. The Original Proof of  
14 Claim set forth no transaction data.

15 C. On May 11, 2020, Madden filed the Amended Proof of Claim, which indicated that  
16 it was amending the Original Proof of Claim. The Amended Proof of Claim set forth certain  
17 transaction data.

18 D. On July 14, 2021, the Reorganized Debtors filed the *Eighth Securities Claims  
19 Omnibus Objection (No Basis for Claim – Failure to Provide Any Trading Information)* [Docket  
20 No. 10922] (the “**Objection**”), which sought, *inter alia*, to disallow and expunge the Original Proof  
21 of Claim on the basis that it did not provide any transaction data. The Objection does not seek to  
22 disallow or expunge the Amended Proof of Claim.

23 E. On August 8, 2021, Madden filed a response to the Objection [Docket No. 11038].

24 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, THROUGH THE  
25 UNDERSIGNED, THE PARTIES JOINTLY REQUEST THE BANKRUPTCY COURT TO  
ORDER, THAT:**

26 1. The Original Proof of Claim shall be deemed expunged, and Prime Clerk LLC, the  
27 claims agent appointed in the Chapter 11 Cases, shall be authorized to update the official claims  
28 register to reflect the terms set forth herein.

1           2. The Amended Proof of Claim will not be expunged by this Stipulation and shall  
2 survive.

3           3. The Debtors and Reorganized Debtors reserve all rights to object to the Amended  
4 Proof of Claim on any grounds.

5           4. This Stipulation shall constitute the entire agreement and understanding of the  
6 Parties relating to the subject matter hereof.

7           5. This Stipulation may be executed in counterparts, each of which shall be deemed an  
8 original but all of which together shall constitute one and the same agreement.

9           6. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or  
10 controversies arising from this Stipulation.

11           Dated: November 16, 2021

12           Dated: November 16, 2021

13           WEIL, GOTSHAL & MANGES LLP  
14           KELLER BENVENUTTI KIM LLP

15           /s/ Richard W. Slack  
16           Richard W. Slack

17           *Attorneys for the Debtors and Reorganized  
18           Debtors*

19           /s/ Michael De Wan Dennis Madden

20           Michael DeWan Dennis Madden